

REMARKS/ARGUMENTS

By the present response, the pending claims will not have been amended and will be re-submitted for consideration by the Examiner. In view of the above, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided.

Applicant notes with appreciation the Examiner's acknowledgment of Applicant's Information Disclosure Statements filed in the present application on December 30, 2005 and January 13, 2006 by the return of the initialed and signed PTO-1449 Forms, and for consideration of the documents cited in the Information Disclosure Statements.

Turning to the merits of the action, the Examiner has rejected claims 11-13 and 15-17 under 35 U.S.C. § 103(a) as being anticipated by YOSHIDA et al. (U.S. Patent No. 6,801,546). The Examiner has rejected claim 14 under 35 U.S.C. § 103(a) over YOSHIDA et al. in view of MORI (U.S. Patent No. 6,384,927).

As noted above, Applicant has not amended the pending claims and resubmitted the same for consideration by the Examiner. Applicant respectfully traverses the above rejection based on the pending claims 11-17 and will discuss the outstanding rejection with respect to these claims in the present application as will be set forth hereinbelow.

Applicant's claims 11-15 generally relate to a facsimile apparatus which transmits image data to a relay Internet facsimile apparatus via PSTN. The relay

Internet facsimile apparatus transmits the image data to a plurality of receiving Internet facsimile apparatus via the Internet. Each of the plurality of the receiving Internet facsimile apparatus has a sub-address and an IP address. The facsimile apparatus has an input which inputs image data and a panel configured to input predetermined information identifying the relay Internet facsimile apparatus and sub-addresses of the plurality of receiving Internet facsimile apparatuses. The relay Internet facsimile apparatus has a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses.

The facsimile apparatus further comprises a controller which, when the predetermined information and the sub-addresses of the plurality of receiving Internet facsimile apparatuses are input by the panel, transmits, to the relay Internet facsimile apparatus via the PSTN, the input image data and the input sub-addresses of the plurality of receiving Internet facsimile apparatuses, based on the input predetermined information identifying the relay Internet facsimile apparatus. Then, the relay Internet facsimile apparatus converts the transmitted image data into data for Internet transmission and relays the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory. Claim 16 recites a related relay Internet facsimile apparatus. Claim 17 recites a related method.

In direct contrast to the previously set for features of Applicant's claimed embodiment, YOSHIDA et al. relates to a network system in which the facsimile

machine A transmits image data to the service provider A, the service provider A transmits the image data, as an affixed file of an e-mail, to the service provider B via the Internet (column 28, lines 1-17). The facsimile machine A has the registration circuit 29 that registers an IP address of the service provider B and a telephone number of the facsimile machine B (column 27, lines 46-56). The facsimile machine A transmits, to the service provider A, "in the sub-address data" the IP address of the service provider B and the telephone number of the facsimile machine B (column 27, lines 46-56).

However, YOSHIDA et al. does not disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus and sub-addresses of a plurality of the receiving Internet facsimile apparatus, the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatuses having a sub-address and an IP address.

Rather, YOSHIDA et al. discloses the facsimile machine A which transmits, to the service provider A, the IP address of the service provider B and the telephone number of the facsimile machine B "in the sub-address data" or in the "sub-address signal" (column 27, lines 53 and 59). The service provider A does not store an IP address of the facsimile machine B and the telephone number of the facsimile machine B. In other words, in YOSHIDA et al., the service provider B associated with the IP address (that is stored) is distinct from the facsimile machine B. On the other hand, in the present invention, the receiving Internet facsimile apparatus associated with the IP address is the same as the receiving Internet facsimile apparatus associated with the

sub-address. Thus, in YOSHIDA et al., the facsimile machine only has a telephone number, while in the present invention, each of the plurality of the receiving Internet facsimile apparatus has a sub-address and an IP address.

In this regard, the Examiner asserts in the outstanding Official Action mailed on March 24, 2006 that in the case the receiving destination facsimile machine is the Internet facsimile machine 1-11 and not the facsimile machine 1-13, the information identifying each of the receiving destination facsimile machines are the IP address and the sub-address.

However, Applicant respectfully traverses the assertion by the Examiner.

The Examiner asserts that "when connecting the line to the service provider of the Internet, the IP address of the opposing service provider (the service provider connected to facsimile machine B of the reception side) and a telephone number of the reception side facsimile machine are registered in the register circuit 24 corresponding to the one-touch key (column 26, lines 61-66)". However, the register circuit 24 is a component of the facsimile machine A (the facsimile machine 1-17), but is not a component of the electronic mail and fax conversion facsimile machine 1-2 or 1-11 (Fig. 29 and column 25, lines 53-54), since the electronic mail and fax conversion facsimile machine 1-2 is contained in the service provider A and the electronic mail and fax conversion facsimile machine 1-11 is contained in the service provider B. Thus, the cited portion of YOSHIDA et al. means that "the IP address of the opposing service provider B and a telephone number of the reception side facsimile machine 1-13 are registered in the register circuit 24 of the facsimile machine 1-17 corresponding to the one-touch key". Therefore, YOSHIDA et al. do not contain any disclosure regarding

whether the electronic mail and fax conversion facsimile machine 1-2 (the service provider A) has a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses. On the other hand, the pending claims recite the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatuses having a sub-address and an IP address.

In this regard, the Examiner asserts in the above Official Action that the service provider A "should" have a memory that stores IP addresses and corresponding sub-addresses of the plurality of receiving Internet facsimile apparatuses, since the service provider A judges whether the service provider B corresponding to the IP address is the contracted one or not (column 28, lines 2-17). However, the recited portion merely states the service provider A judges whether the service provider B corresponding to the IP address is the contracted one or not. Thus, the service provider A can have a memory that stores the IP address of the service provider B. However, the recited portion does not contain any disclosure regarding "a sub-address" of the service provider B. Regarding the sub-address, in YOSHIDA et al., in performing the facsimile communication, the facsimile machine A sets the IP address of the service provider B and the telephone number of the facsimile machine B in the sub-address data in the facsimile communication procedure of ITU T.30. In other words, the IP address and the telephone number of the service provider are located in the sub-address data of the facsimile communication procedure. However, no sub-address of an apparatus is

provided therein. Thus, according to the teachings of YOSHIDA et al., the sub-address area is utilized as a storage location for retaining the IP address of the service provider B and the telephone number of the facsimile B. Therefore, YOSHIDA et al. do not disclose the service provider A that has a memory that stores a memory that stores IP addresses and corresponding sub-addresses of the plurality of receiving Internet facsimile apparatuses.

Further, in YOSHIDA et al., even though the Internet facsimile machine 1-2 judges whether the service provider B corresponding to the IP address is the contracted one or not, the facsimile machine 1-17 transmits to the Internet facsimile machine 1-2 an IP address of the Internet facsimile machine 1-11, and the Internet facsimile machine 1-2 performs a communication to the Internet facsimile machine 1-11, based on the received IP address of the Internet facsimile machine 1-11 (column 27, lines 46-67 and column 28, lines 1-17).

Therefore, even if (merely for argument sake) Applicant were to consider the case posited by the Examiner that the receiving destination facsimile machine is the Internet facsimile machine 1-11 and not the facsimile machine 1-13, Applicant submits that the information identifying the Internet facsimile machine 1-11 is only an IP address of the Internet facsimile machine 1-11, since the service provider A does not have a memory that stores both IP addresses and corresponding sub-addresses of the plurality of receiving Internet facsimile apparatuses.

Accordingly, Applicant submits that YOSHIDA et al. does not disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus and sub-addresses of a plurality of the receiving Internet facsimile

apparatus, the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatuses having a sub-address and an IP address. Rather, YOSHIDA et al. disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus 1-2 and an IP address of the receiving Internet facsimile apparatus 1-11, the relay Internet facsimile apparatus having a memory that stores IP address of the receiving Internet facsimile apparatus 1-11, and the receiving Internet facsimile apparatus 1-11 having an IP address. However, this is not what Applicant's claims recite and require.

Yet additionally, YOSHIDA et al. does not disclose a memory in the relay Internet facsimile apparatus (considered by the Examiner to be service provider A) that stores addresses of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet facsimile addresses as recited in Applicant's claims. Applicant's claims require the memory (of the relay) to store IP addresses and corresponding sub-addresses. As is clearly set forth in the paragraph bridging columns 27 and 28 of YOSHIDA et al., the facsimile machine A performs facsimile communication with the service provider A. In performing the facsimile communication, the facsimile machine A sets the IP address of the service provider B and the telephone number of the facsimile machine B in the sub-address data in the facsimile communication procedure of ITU T.30. In other words, the IP address and the telephone number of the service provider are located in the sub-address data of the facsimile communication procedure. However, no sub-address of an apparatus is

provided therein. Rather, according to the teachings of YOSHIDA et al., the sub-address area is utilized as a storage location for retaining the IP address of the service provider B and the telephone number of the facsimile B.

As is clear from this paragraph of YOSHIDA et al., the sub-address region or location is utilized to store an IP address of a service provider B and a telephone number of the facsimile B but no sub-address of the receiving Internet facsimile apparatus is stored therein. In contrast, according to the teachings of Applicant's invention, the relay Internet facsimile apparatus has a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet facsimile apparatuses. YOSHIDA et al. merely uses the sub-address region to store information (i.e., IP address and telephone number) of a service provider and a facsimile machine. This is quite distinct from the recitations of Applicant's claims.

In this regard, the Examiner asserts in the outstanding Official Action mailed on March 24, 2006, that "the service provider A or B (the relay Internet facsimile apparatus) should have a memory (a table) that stores IP addresses and corresponding sub-addresses of the plurality of receiving Internet facsimile apparatus in order to judge whether the IP address corresponding to a service provider is the contracted one or not".

However, Applicant respectfully traverses this assertion by the Examiner.

As discussed above, column 28, lines 2-17 of YOSHIDA et al. merely states the service provider A judges whether the service provider B corresponding to the IP address is the contracted one or not. Thus, the service provider A can have a memory

that stores the IP address of the service provider B. However, the recited portion does not contain any disclosure regarding "a sub-address" of the service provider B. Regarding the sub-address, in YOSHIDA et al., the IP address and the telephone number of the service provider are located in the sub-address data of the facsimile communication procedure. However, no sub-address of an apparatus is provided therein. Thus, according to the teachings of YOSHIDA et al., the sub-address area is utilized as a storage location for retaining the IP address of the service provider B and the telephone number of the facsimile B. Therefore, YOSHIDA et al. do not contain any disclosure regarding "a sub-address" of the service provider B, and thus YOSHIDA et al. do not disclose the service provider A that has a memory that stores a memory that stores IP addresses and corresponding sub-addresses of the plurality of receiving Internet facsimile apparatuses.

Additionally, in YOSHIDA et al., even though the Internet facsimile machine 1-2 judges whether the service provider B corresponding to the IP address is the contracted one or not, the facsimile machine 1-17 transmits to the Internet facsimile machine 1-2 an IP address of the Internet facsimile machine 1-11, and the Internet facsimile machine 1-2 performs a communication to the Internet facsimile machine 1-11, based on the received IP address of the Internet facsimile machine 1-11 (column 27, lines 46-67 and column 28, lines 1-17).

Therefore, Applicant submits that YOSHIDA et al. does not disclose a memory in the relay Internet facsimile apparatus (considered by the Examiner to be service provider A) that stores addresses of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet

facsimile addresses, as recited in Applicant's claims. Rather, Applicant submits that YOSHIDA et al. merely disclose a memory in the Internet facsimile apparatus 1-2 that can store an IP address of the receiving Internet facsimile apparatus 1-11.

YOSHIDA et al. also does not disclose a facsimile apparatus which transmits the input image data to the relay Internet facsimile apparatus via the PSTN, the relay Internet facsimile apparatus relaying the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory of the relay Internet facsimile apparatus.

Rather, YOSHIDA et al. discloses a facsimile machine A which transmits the image data to the service provider A via the PSTN, the service provider A relaying the converted data to the service provider B via the Internet, based on the IP address of the service provider B, the IP address of the service provider B being transmitted by the facsimile machine A to the service provider A. In other words, in YOSHIDA et al., the service provider A receives the IP address of the service provider B from the facsimile machine A in order to relay the converted data to the service provider B via the Internet. Further, in YOSHIDA et al., the service provider B receives the telephone number of the facsimile machine B from the facsimile machine A via the service provider A in order to relay the image data to the facsimile machine B via a PSTN. Thus, in YOSHIDA et al., the service provider A has no need to store IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses. Rather, the memory recited in the pending

claims is not disclosed by and is unnecessary for the operation of the YOSHIDA et al. communication apparatus.

In this regard, Applicant submits that the portion (column 28, lines 2-17) recited by the Examiner merely states the service provider A judges whether the service provider B corresponding to the IP address is the contracted one or not. However, the recited portion does not contain any disclosure regarding "a sub-address" of the service provider B. Thus, Applicant submits that YOSHIDA et al. do not disclose a memory in the relay Internet facsimile apparatus that stores addresses of the plurality of receiving Internet facsimile apparatuses corresponding to sub-addresses of the plurality of receiving Internet facsimile addresses, as recited in Applicant's claims.

Thus, the pending claims are clearly distinguished over YOSHIDA et al.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 11-17 are not disclosed in YOSHIDA et al. cited by the Examiner. The pending claims are also submitted to be patentable over the Examiner's proposed reference since YOSHIDA et al. does not render obvious the combination of the above-noted features recited in Applicant's claims 11-17.

Regarding the rejection of claim 14 under 35 U.S.C. § 103 as unpatentable over YOSHIDA et al. in view of MORI, the Examiner asserts in the outstanding Official Actions filed on October 3, 2005 and March 24, 2006 that MORI discloses an Internet facsimile machine (Figs. 1-2) transmitting image data to a relay Internet facsimile apparatus which uses NSS signal to transmit the sub-address of the receiving Internet facsimile apparatus (column 10, lines 53-57).

MORI relates to a system in which a first repeater Internet facsimile machine F11 is installed in the same country as the transmitting machine FX1, the first repeater Internet facsimile machine F11 transfers the image information to a second repeater Internet facsimile machine F12, the second repeater Internet facsimile machine F12 is installed in a different country from the first repeater Internet facsimile machine F11, and the second repeater Internet facsimile machine F12 is installed in the same country as the recipient machine FX2.

However, MORI does not disclose a facsimile apparatus which inputs predetermined information identifying the relay Internet facsimile apparatus and the sub-address of a plurality of receiving Internet facsimile apparatuses, the relay Internet facsimile apparatus having a memory that stores IP addresses of the plurality of receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses, each of the plurality of the receiving Internet facsimile apparatus having a sub-address and an IP address. Rather, MORI discloses an ordinary facsimile machine FX1 which transmits, to the repeater Internet facsimile machine F11, the e-mail address of the repeater Internet facsimile machine FX2 and the sub-address of the ordinary facsimile machine F12. The repeater Internet facsimile machine FX1 does not store an IP address of the ordinary facsimile machine F12 and the sub-address of the ordinary facsimile machine F12. In other words, in MORI, the repeater Internet facsimile machine FX2 of the e-mail address is distinct from the ordinary facsimile machine F12 associated with the sub-address. On the other hand, in the present invention, the receiving Internet facsimile apparatus associated with the IP address is identical to the receiving Internet facsimile apparatus associated

with the sub-address. Thus, in MORI, ordinary facsimile machine FI2 only has a sub-address, while in the present invention, each of the plurality of the receiving Internet facsimile apparatus has both a sub-address and an IP address.

MORI et al. also does not disclose a facsimile apparatus which transmits the input image data to the relay Internet facsimile apparatus via the PSTN, the relay Internet facsimile apparatus relaying the converted data to the plurality of the receiving Internet facsimile apparatuses via the Internet, based on the plurality of the IP addresses of the receiving Internet facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses stored in the memory of the relay Internet facsimile apparatus. Rather, MORI discloses an ordinary facsimile machine FX1 which transmits the image data to the repeater Internet facsimile machine FX1 via a telephone network, the repeater Internet facsimile machine FX1 relaying the converted data to the repeater Internet facsimile machine FX2 via the Internet, based on the e-mail address of the repeater Internet facsimile machine FX2 stored on the parameter memory of the repeater Internet facsimile machine FX1. The parameter memory 3 of the repeater Internet facsimile machine FX1 stores the sub-address of the ordinary facsimile machine FI2 and the corresponding e-mail address of the repeater Internet facsimile machine FX2. The parameter memory 3 of the repeater Internet facsimile machine FX1 does not store the sub-address of the destination facsimile machine FI2 and the corresponding e-mail address of the destination facsimile machine FI2. On the other hand, in the present invention, the relay Internet facsimile apparatus has a memory that stores IP addresses of the plurality of receiving Internet

facsimile apparatuses corresponding to the sub-addresses of the plurality of receiving Internet facsimile apparatuses.

Thus, the pending claims are clearly distinguished over MORI.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 11-17 are not disclosed in MORI cited by the Examiner. The pending claims are also submitted to be patentable over the Examiner's proposed combination since neither YOSHIDA et al., MORI, nor the combination thereof render obvious the combination of the above-noted features recited in Applicant's claims 11-17.


Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections and requests an indication of the allowability of all the claims pending in the present application, in due course.

SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has not amended the rejected claims but has submitted them for reconsideration by the Examiner. With respect to the pending claims, Applicant has pointed out the features thereof and has contrasted the features of the claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

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